

# **EXHIBIT A**

April 5, 2019

Dean Harvey  
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**VIA EMAIL**

Defendants' Counsel  
(Please see full list of recipients below)

RE: *Crain & Serna v. Accredited Surety & Cas. Co., et al.*, No. 3:19-cv-01265-JST (N.D. Cal.)

Dear Counsel:

On behalf of Plaintiffs in the above-referenced matter, I write to request that we schedule a meet-and-confer under Federal Rule of Civil Procedure 26(f). The conference must occur by May 1, 2019—at least 21 days prior to the May 22, 2019 initial case management conference. *See* Fed. R. Civ. P. 26(f)(1). Please provide us with your collective availability the week of April 15, 2019.

At the conference, we expect that you will be prepared to discuss the topics set forth in Rule 26(f) and the Court's standing order. *See* Standing Order for All Civil Cases Before District Judge Jon S. Tigar. To facilitate our discussions, I provide the following list of topics:

1. The timing and form for initial disclosures under Rule 26(a). Fed. R. Civ. P. 26(f)(3)(1).
2. The subjects on which discovery may be needed. Fed. R. Civ. P. 26(f)(3)(B). Plaintiffs refer you to Plaintiffs' letters dated January 29, 2019 regarding the preservation of documents and the discovery requests propounded pursuant to the California Code of Civil Procedure on February 20, 2019. These subjects for discovery are reiterated at the end of this letter for your convenience.
3. A proposed order governing the protocol and required specifications for the preservation and production of electronically stored information ("ESI"). Fed. R. Civ. P. 26(f)(3)(C). Please note Judge Tigar's preference to use the District's model ESI order, attached as Exhibit A. *See* Judge Tigar's Standing Order, Paragraph (G).
4. Please be prepared to discuss the topics identified in the District's ESI meet-and-confer checklist. *See* Judge Tigar's Standing Order, Paragraph (D) ("Failure to meet and confer regarding the required topics prior to the initial case management conference, including alternative dispute resolution and ESI, may, in the reasonable exercise of the Court's discretion, result in sanctions or disciplinary action."). These include, among other things:

- a. Any ESI you believe is not reasonably accessible;
- b. Whether or not to continue any interdiction of any document destruction program;
- c. The names and/or general job titles of custodians for whom ESI will be preserved;
- d. The number of custodians for whom ESI will be preserved;
- e. ESI systems that will be preserved that are not associated with individual custodians, like enterprise databases or share drives;
- f. The description and location of systems in which potentially discoverable information is stored;
- g. The search methods and methodologies that will be used to identify discoverable ESI; and,
- h. Procedures following inadvertent disclosure of privileged material.

5. A proposed discovery plan. Fed. R. Civ. P. 26(f)(2)-(3).
6. A proposed order governing expert discovery. Fed. R. Civ. P. 26(a)(2).
7. A proposed Protective Order governing confidentiality. Fed.R.Civ.P. 26(c); Judge Tigar's Standing Order, Paragraph (G). Please note Judge Tigar's preference to use the District's model protective order, attached as Exhibit B. See Judge Tigar's Standing Order, Paragraph (G).

**Subjects for Discovery:** All potentially relevant evidence, including documents relating to the allegations in the complaints and / or members of the proposed class. Potentially relevant evidence includes, at least, all of the following topics, without regard to time period, custodian category, or format of documents or ESI. This list of topics contains examples only, and it is provided here without prejudice to Plaintiffs requesting discovery regarding additional topics. The below list does not provide Defendants with any justification for destroying or failing to preserve potentially relevant evidence that is not specifically enumerated.

1. All documents regarding any communications between or among you, any bail bond agent, any surety company, or any organization representing bail bond agents or sureties pertaining to the following topics:

- a. Submissions to, or communications with, the California Department of Insurance ("CDI") in connection with bail bonds;
- b. Bail bond premiums;
- c. Bail bond rebates;
- d. Bail bond pricing; or

- e. Bail bond advertisements, marketing, or other statements to actual or potential bail bond purchasers.
2. All documents regarding any policy or practice regarding any topic in No. 1 above.
3. All documents regarding enforcement, monitoring, or implementation of any agreements or policies relating to any topic described in Request Nos. 1 or 2 above.
4. All documents regarding any meetings or individual who attended any meetings, or who had any communications, with any individual regarding any topic described in Request Nos. 1 or 2 above, including:
  - a. all minutes, notes, agendas, or other documentation memorializing or discussing such meetings;
  - b. all diaries, calendars (electronic or otherwise), pocket calendars, personal digital assistants, appointment books, and appointment notes;
  - c. trip and travel logs, records, and supporting documents; and,
  - d. telephone number logs, directories, notebooks, card files and memoranda.
5. All documents or data collecting the premiums charged or rebates offered by you or any other person(s) in connection with bail bonds.
6. All documents that are used to train employees or bail agents about premium rate pricing, rebates, or negotiation with potential customers.
7. If you are not a natural person, all documents showing your organizational structure regarding all individuals involved in the setting of bail bond premium rates or rebates, including, without limitation, organization charts, telephone or email directories, personnel biographies, and individual job descriptions.
8. Data regarding all bail bonds you have sold or offered in the state of California, including:
  - a. name of the payor;
  - b. the total amount of bond posted;
  - c. the premium rate charged to the bond;
  - d. any rebates that were applied to the bond;
  - e. reason for premium rate or rebate, where applicable;
  - f. gender;
  - g. race;
  - h. age;
  - i. any other demographic information collected (e.g., income);
  - j. location;

- k. the identity of the surety backing the bond and the agent who facilitated the bond;
- l. the court in which the bond was posted;
- m. whether any amount of the bond premium was subsequently returned to the payor;
- n. the amount retained by the bail bond agent versus the surety backing the bond;
- o. whether the bond was subsequently revoked based on the accused's failure to appear in court and whether the court or another government entity subsequently collected any portion of the bond from you;
- p. any other bail bond data maintained systematically.

9. Any data you maintain or possess about bail bond premium rates charged, or rebates offered, by your competitors or, for trade association defendants, by your members, including but not limited to transaction-level information specified in No. 8 and aggregate-level information.

10. All business plans, analyses, reports, studies, memoranda, budgets, forecasts, slide presentations, strategic plans, SWOT ("Strengths, Weaknesses, Opportunities and Threats") analyses, or costs or revenue projections referring or relating, in whole or in part, to competition for bail bonds.

11. All documents that analyze, evaluate, or summarize market conditions regarding bail bonds, including without limitation, documents concerning premium rates and rebates, competition, market shares, competitive position, and loss ratios.

12. All documents that refer or relate to the provision of bail bonds by a competing bail agent or surety in California.

13. All documents regarding attempts by bail agents or bail bond companies to offer rates lower than the Maximum Filed Rate or to offer rebates to prospective purchasers of bail bonds in California.

14. All documents reflecting actuarial or other analysis concerning bail bonds and the risk of loss or required bond payment associated with different groups of accused persons and the relationship of risk with the premium rate charged or rebates offered, whether in California or elsewhere.

15. All documents concerning any analysis, summary, or description of factors affecting loss ratios, risk, premium rates, or rebates with respect to bail bonds in California.

16. All documents concerning any method, formula, policy, practice, or calculation you use, or any competing bail bond agent or surety uses, for determining bail bond rates or rebates.

17. All communications between you and CDI concerning bail bond premium rates and rebates.

18. All documents or communications pertaining to public statements, such as website pages, discussing bail bond pricing, rebating, and CDI rate filings, regardless of whether you created or maintained such statements.

19. All agendas, minutes, notes, or memoranda of any meeting of your board of directors or governing body, or that of any competing bail bond agent or surety, or any committee thereof relating to how you or any defendant or co-conspirator determine California bail bond rates or rebates.

20. All agendas, minutes, notes, or documents pertaining to trade association meetings where bail bond rates, prices, or rebates were discussed, regardless of whether the meetings occurred in California and regardless of whether those discussions were focused on California or national trends.

21. All documents and records regarding marketing and other competitive efforts to attract purchasers of your bail bond services in California.

22. All documents regarding summaries of revenues you generated from bail bond premiums since February 24, 2004, including information sufficient to reflect gross profit and the breakdown of associated costs or losses in California.

23. All documents concerning how bail bond sureties or agents negotiate premium rates, commission rates, and rebates.

24. All documents regarding factors relevant to deciding whether to reduce premium rates or offer rebates to customers.

25. All documents regarding competition between alleged co-conspirators (including but not limited to all named Defendants) and/or any other competing bail bond surety or agent in California.

26. Documents sufficient to explain the meaning of the data responsive to any of these requests, including all record layouts, data dictionaries, field codes, and other codes or descriptions.

27. Organization charts sufficient to identify:

a. Individuals who act as custodians of business records and other information for you, such as all persons responsible for ESI management, organization, retention, preservation, and destruction of ESI;

- b. All of your internal information services or information technology departments; and,
- c. All individuals who are responsible for creating back-ups for archiving email messages.

28. Documents that reflect or describe your policies, procedures, and guidelines for your company's use or retention of email, instant messages, or other forms of electronic communications.

29. Documents that reflect or describe your document retention policies and any litigation hold implemented in connection with this litigation, including the date that any litigation hold was implemented.

30. All documents referring to the concealment, destruction or spoliation of any documents that are responsive to any of these preservation requests.

31. Documents sufficient to show how to operate or run any of the programs maintained on the computer-related equipment or system you utilize to maintain data responsive to any of these requests, including whether any such data can be produced within an Excel spreadsheet.

32. All documents provided to, transmitted to, received from, or concerning plaintiffs in this action.

33. Documents sufficient to identify all third parties you have used to:

- a. identify, communicate with, and/or solicit potential customers of bail bond services;
- b. calculate bail bond premium rates or rebates in California;
- c. survey bail bond premium rates or rebates offered by other entities irrespective of location; and,
- d. otherwise analyze any topic covered by these preservation requests.

34. All documents regarding communications and/or meetings with any of the third-parties described in No. 33, including contracts.

35. Documents sufficient to identify all individuals responsible for retaining or managing the third parties described in No. 33.

36. All documents you have provided to, or received from, any of the third parties described in No. 33 regarding any of the topics described in No. 33.

37. All documents relating to your policies or practices regarding compliance with federal or state antitrust laws.

38. All documents regarding *Pacific Bonding Corp. v. John Garamendi*, No. GIC815786 (Cal. Sup. Ct. Feb. 24, 2004) and/or California's Proposition 103.

39. All documents regarding the legality, propriety, or availability of discounts or rebates affecting the amount paid for bail bonds, including advertisements or other statements made to actual or potential bail bond customers.

40. All marketing materials, including websites, and draft marketing materials that discuss bail bond premium rates and rebates offered by you or your agents, and/or your ability to offer premium rates or rebates below the Maximum Filed Rate, including but not limited to communications with consultants and vendors providing services connected to marketing and advertising.

41. All documents you intend to use or rely upon at trial.

42. All documents that support any of your affirmative defenses in this case.

43. All applicable insurance agreements under which any insurer may be liable to satisfy all or part of any judgment which may be entered in this action, or to indemnify or reimburse you for payments made to satisfy all or part of any judgment.

I look forward to discussing these matters with you.

Sincerely,



Dean M. Harvey

Attachments

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